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Confidential: Yes ☐ No ☒  
Admin. Exp. Yes ☒ No ☐  
Key Words/Comments: Second request  
from American Chemet Corp.  
and map

DEC 15 2005

**AMERICAN**  
**chemet**  
CORPORATION

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Daniel B. Brimhall  
Vice President, Operations

December 14, 2005

Mr. John Wardell, Director, Montana Office, USEPA  
10 W. 15<sup>th</sup> Street  
Suite 3200  
Helena, MT 59626

Dear Mr. Wardell:

Since my earlier letter regarding our petition to reconsider the PRP status and our possible utilization of the Asarco smelter site, there has been a new development that I want to make you aware of.

We met yesterday with Mr. Tom Aldrich, Vice President, Environmental Affairs, Asarco, and Mr. John Nickel, Environmental Manager, Asarco to discuss Chemet's future needs, and Asarco's future plans.

Asarco is working on a five year plan aimed at bringing closure to their involvement with the East Helena site, to the greatest extent possible.

We expressed Chemet's need for, at the very least, additional acreage for expansion, and possibly being able to utilize the entire Asarco plant site. Chemet has a current need for a larger change house, additional office space, more warehouse space, processing space, and a building with baghouse capacity in which to install a new melting furnace for high purity copper scrap and cathode.

All of these items are currently present and not in use at the East Helena site.

We also expressed Chemet's desire to have adequate buffer land around its operations so as to minimize future impact on surrounding neighbors as the adjacent agricultural lands are being converted to residential use. Acquisition of the entire site would provide that buffer for Chemet.

Both Asarco and Chemet would like to move as quickly as possible towards reaching an agreement to buy and sell. As stated in our earlier letter, we are in need of your help regarding the environmental concerns associated with such an acquisition. We believe that Asarco is presently committed to providing the

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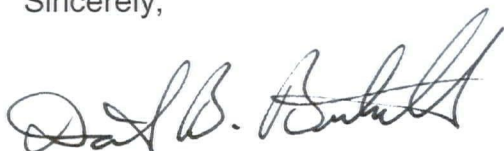
resources to effect a good cleanup of the site which would render it perfectly suitable as a "brown field" industrial facility which would certainly help Chemet to continue to expand, and contribute to the local economy.

Toward that end, we are requesting that you consider having a meeting with Chemet, Asarco, and the Region personnel required to begin discussing how we might be able to move forward. Chemet would be happy to make a presentation of historical information and our current situation and requests.

Again, as was mentioned in the earlier letter, given the uncertainty associated with the Asarco bankruptcy, and the immediacy of Chemet's needs, time is of the essence, so we are asking for your help to find an acceptable solution to the environmental issues of all concerned. We believe that the EPA, working in conjunction with Chemet and Asarco, can be instrumental in bringing about a win, win, win solution which will result in the greatest public good for our local area so desperately in need of economic development.

Thank you for your help.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dan B. Brimhall". The signature is fluid and cursive, with the first name "Dan" and last name "Brimhall" clearly distinguishable.

Daniel B. Brimhall  
Vice President, Operations

CC: Mr. Scott Brown  
Mr. W.W. Shropshire  
Mr. E.L. Schindler  
Mr. E.K. Palmer

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